March 9, 2005

Illinois Commerce Commission
527 East Capitol Ave
Springfield, IL 62701

Subject: Comment on the Proposed Renewable Portfolio Standard

The Governor's proposed Renewable Energy Portfolio is timely, forward-looking and necessary. His agenda will advance the manifold benefits he's promoting: cleaner air, new jobs and increased in-State investment.

My commentary is intended to encourage the Governor and all elected officials to expand their discussion of environmental policy so the Plan may be implemented more quickly and with the greatest possible environmental, and financial, impact.

DECENTRALIZE THE REQUIREMENT:
The proposal recommends that by 2006 at least 2% of Illinois electricity sold to customers be generated from "renewable energy sources." I suggest allowing and encouraging the decision to be made not just by the electric utilities, but by electricity users themselves. Allow for the possible decentralization of power generation throughout the state by allowing users to generate energy on-site. And allow this decentralized energy to count towards the State goal. With decentralization, the customer can help the utilities to meet the program's goals; and the State would be allowing the maximum degree of flexibility in the implementation of its renewable energy plan.

Specifically, by not requiring the energy generated by alternative means to enter the overburdened electricity grid, renewable energy technologies will be allowed to thrive on their own. Remember, removing a heavy user from the grid is equal to adding more power to the grid. Let the marketplace determine the fate of new energy generating and energy recovery technologies. Allow on-site energy recovery technologies to help increase the use of renewable energy by Illinois.

This so-called "distributed generation" model has been applied before: for example, when an industrial energy consumer installs photovoltaic cells on the plant roof, it does so because the practice is economic and because the plant can utilize the energy internally to run its boilers, hot water heaters or even to fulfill its refrigeration requirements.

By allowing the consumer of electricity to make its own choices regarding which technology is right for them, the State will maximize the flexibility of its plan to encourage the development and installation of smaller, self-sustaining renewable energy systems. Further, by freeing the end-user to make the appropriate technological and financial determination, they will not only make the choice that is right for that specific business application. They will also reduce energy demand on the utilities. Thus, the energy savings should be counted towards the State goal.

The industrial user will be most likely to follow procurement patterns that meet the stated goals of the plan if he or she is free to advance the technology best for that particular industry. As the plan states, it is in the customer's own best interest to utilize "a competitive approach to renewable energy procurement." Allowing decentralized energy generation allows Illinois business to maximize its competitive edge in an increasingly difficult economic environment.

EXPAND THE DISCUSSION OF ALLOWABLE TECHNOLOGIES

In his cover letter, the Governor refers to wind power. Naturally, from that point on, most subsequent discussions of renewable energy technologies focus on wind. But this focus could lead to losing some technological opportunities. These include environmentally sensitive thermal technologies that provide safe, clean and abundant energy from renewable sources. These passive technologies include solar thermal power and gasification.

Low-Temperature Gasification is a surprisingly clean, environmentally sensitive, almost passive thermal treatment method that allows even the smallest industrial users to reduce their demand for fossil or nuclear fuels.

Furthermore, gasification addresses more than one of Illinois' environmental concerns at a time. In Illinois, the amount of municipal solid waste generated rises ach year. According to the IEPA's latest *Nonhazardous Solid Waste Management and Landfill Capacity in Illinois* biennial report, promulgated in November, 2004, the bulk (55%) of that municipal solid waste is sent to a landfill. Additionally, another 15% of that waste is incinerated. Neither of these antiquated technologies represents an efficient means for recovering energy from the waste stream. Neither of these technologies is consistent with the Governor's plan to promote and develop renewable sources of energy.

Unfortunately, by State Statute the "heating", that is to say, even the most benign of thermal treatments for solid waste, is excluded by definition from being recognized as "Renewable Energy." Despite the fact that modern society discards huge amounts of potential clean energy everyday, the State of Illinois looks the other way.

The State's definition of "Renewable Energy" must be changed to meet the conditions for technological innovation. As it stands, the State's definition of renewable energy can be seen as highly political and prejudicial. The State's definition precludes even the possibility for technological innovation in this important area of environmental concern. Its position is inconsistent with the Governor's stated goal of advancing the development of renewable energy sources.

As noted in the IEPA's report cited above, "In 2003, Illinois landfills accepted more than 57 million gate cubic yards of solid waste." When converted to gas, a single ton of solid waste has the approximate energy equivalent of one barrel of oil If even 10% of Illinois solid waste were turned to energy, imagine how new gasification technologies might reduce our reliance on fossil fuels, increasing our energy independence at a time of national emergency.

Thank you again for educating the public on the benefits of renewable energy. However, with slight modification of the existing plan, our State will reach more quickly and exceed the intended environmental and financial benefits for Illinois.